

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

X

PEOPLE OF THE STATE OF NEW YORK, by
ELIOT SPITZER, ATTORNEY GENERAL OF THE
STATE OF NEW YORK,

CV 99 4951

Plaintiffs,

-against-

DELTA FUNDING CORPORATION, DELTA
FINANCIAL CORPORATION, ALL STATE
CONSULTANTS, INC. a/k/a & d/b/a CITY
MORTGAGE BANKERS INC., PGM ENTERPRISE
INC., RICHMINT FUNDING LTD. d/b/a THE MONEY
CENTER, TARHEEL FUNDING INC., JOHN
DOE CORP.'S 1-10, DELTA FUNDING HOME
EQUITY LOAN TRUST, and BANKERS TRUST
COMPANY OF CALIFORNIA, N.A.,

Index No.

COMPLAINT
AND JURY DEMAND

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U.S. DISTRICT COURT
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GO, M.

Defendants.

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The People of the State of New York, by and through their attorney, Eliot Spitzer,
Attorney General of the State of New York, as and for their complaint, allege, upon information
and belief, as follows:

PRELIMINARY STATEMENT

1. Plaintiffs bring this action to seek redress against a finance company, Delta Financial Corporation, its wholly-owned subsidiary, Delta Funding Corporation, (collectively "Delta" or "Delta defendants"), and certain mortgage brokers who refer business to Delta. Collectively, these defendants have engaged in a pattern and practice of targeting low-income minority homeowners and inducing them to enter into illegal, discriminatory, and fraudulent high-cost mortgage loans, which defendants have reason to know these borrowers either cannot repay or can repay only through extreme personal and financial privation.

(Signature)